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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER
IN SUPPORT OF PLAINTIFF WAYMO
LLC'S ADMINISTRATIVE MOTION TO
FILE UNDER SEAL ITS OPPOSITION
TO UBER'S MOTION TO COMPEL
FURTHER DEPOSITION OF PIERRE-
YVES DROZ**

1 I, Lindsay Cooper, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under
7 Seal information in its Opposition to Uber’s Motion to Compel Further Deposition of Pierre-Yves
8 Droz (the “Administrative Motion”). The Administrative Motion seeks an order sealing the following
9 materials:

Document	Portions to Be Filed Under Seal	Designating Party
Portions of Exhibit 1 to Waymo’s Opposition to Uber’s Motion to Compel Further Deposition of Pierre-Yves Droz (“Exhibit 1”)	Portions highlighted in green	Waymo

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15 3. Exhibit 1 contains or refers to trade secret information, which Waymo seeks to seal.
16 Portions of Exhibit 1 (portions highlighted in green) contain, reference, and/or describe Waymo’s
17 asserted trade secrets. Specifically, the highlighted portions describe and reference the technical
18 details of one or more of Waymo’s asserted trade secrets.

19 4. I understand that these trade secrets are maintained as secret by Waymo (Dkt. 25-47)
20 and are valuable as trade secrets to Waymo’s business (Dkt. 25-31). The public disclosure of this
21 information would give Waymo’s competitors access to in-depth descriptions—and analysis—of the
22 functionality of Waymo’s autonomous vehicle system. If such information were made public, I
23 understand that Waymo’s competitive standing would be significantly harmed. Waymo’s request to
24 seal is narrowly tailored to only the confidential information.

1 I declare under penalty of perjury under the laws of the State of California that the foregoing is
2 true and correct, and that this declaration was executed in San Francisco, California, on August 9,
3 2017.

4 By /s/ Lindsay Cooper
5 Lindsay Cooper
6 Attorneys for WAYMO LLC
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SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Lindsay Cooper.

/s/ Charles K. Verhoeven
Charles K. Verhoeven